

D R A F T
7(a) Loan File Checklist

Loan Name _____	
SBA Loan Number _____	Approved Amount \$ _____
Lender Name _____	Current Balance \$ _____
Approval Date _____	Funding Date _____
Guaranty Fee Due _____	Guaranty Fee Paid _____
Reviewer Name _____	Review Date _____

Check any of the following that apply to this loan

<input type="checkbox"/> Current	<input type="checkbox"/> Past Due/Delinquent	<input type="checkbox"/> Liquidation	<input type="checkbox"/> Rental Property
<input type="checkbox"/> EPC/OC	<input type="checkbox"/> Franchise	<input type="checkbox"/> Debt Refinancing	<input type="checkbox"/> Change in Ownership

Use of Proceeds

_____ Inventory	_____ Working Capital	_____ Machinery/Equipment
_____ Furniture/Fixtures	_____ Purchase R/E	_____ Construct R/E
_____ Debt Refinancing	_____ Leasehold Improvements	_____ Other _____
_____ Other _____	_____ Other _____	_____ Other _____

1. SBA Form 912, "Statement of Personal History" obtained on each applicable loan participant, and all loan applicants and Associates are of good character. (13 CFR §120.110(n), 191)

Yes ☐ No ☐

 - ✓ Personal histories required from all principals; (13 CFR §120.191; SOP 50 10 4e, Subpart A, Chapter 6, Paragraph 4.d.; or alternate SBA Form 1919 for *SBAExpress/Community Express* (*SBAExpress/CommunityExpress* Program Guides) and
 - ✓ No Associate is incarcerated, on probation, or parole, or indicted for specified crime(s). (13 CFR §120.110(n); SOP 50 10 4e, Sub A, Chap 2, Para 8.n.)

2. Size determinations were correct and analyzed according to SBA policy. (13 CFR §120.100(d))

Yes ☐ No ☐

 - ✓ Business is small via size determination as of the date of the lender's approval of the loan and any possible affiliation has been identified (primary industry of SBC, NAICS code, size standard, annual receipts or employees of SBC, size conclusion); (SOP 50 10 4e, Sub A, Chap 2, Para 2.f.; Sub A, Chap 3) and
 - ✓ If there are any affiliates, determination that business and affiliate group meet SBA's size standards (primary industry of affiliate group, NAICS code and size standard for that industry, affiliate group's combined annual receipts or employees, size conclusion). (SOP 50 10 4e, Sub A, Chap 3, Para 3)

3. Written evidence that credit is not otherwise available on terms not considered unreasonable without guarantee provided by SBA. (13 CFR §120.101; SOP 50 10 4e, Sub A, Chap 2, Para 3)

Yes ☐ No ☐

4. Personal resources test was applied and enforced according to SBA policy. (13 CFR §120.102; SOP 50 10 4e, Sub A, Chap 2, Para 4)
(Applies to gross liquid assets of each proprietor, general partner, limited partner owning 20% or more of business, each limited liability company owner, each stockholder with 20% or more ownership, and owner spouse(s)).

Yes ☐ No ☐

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5. Business is a for-profit, domestic operation. (13CFR §120.110; SOP 50 10 4e, Sub A, Chap 2, Para 8) Yes ☐ No ☐
✓ The following businesses are **not eligible**, unless certain exceptions have been met: Non-Profit (13 CFR §120.110(a)); Engaged in lending (§120.110(b)); Passive holder of real and/or personal property (§120.110(c)); Life insurance company (§120.110(d)); Located in a foreign country (§120.110(e)); Pyramid sales distribution plan (§120.110(f)); Engaged in gambling (§120.110(g)); Illegal (§120.110(h)); Restricted membership (§120.110(i)); Government-owned (§120.110(j)); Engaged in promoting religion (§120.110(k)); Consumer or marketing cooperative (§120.110(l)); Engaged in loan packaging (§120.110(m)); Lender or CDC ownership (§120.110(o)); Sexually prurient in nature (§120.110(p)); With associate engaged in political or lobbying activities (§120.110(r)); or Speculative (§120.110(s)).
6. No prior loss to the Government from prior federal financial assistance demonstrated by loan applicant(s). (13 CFR §120.110(q); SOP 50 10 4e, Sub A, Chap 2, Sec 8.q.) Yes ☐ No ☐
7. All EPC/OC conditions have been met. (13 CFR §120.111; SOP 50 10 4e, Sub A, Chap 2, Para 9) Yes ☐ No ☐ N/A ☐
✓ Written lease plus options for term of loan, and subordinated to loan; (§§120.111(a)(3), 111(a)(4))
✓ Assignment of rents paid; (§120.111(a)(3))
✓ OC is co-borrower or guarantor, and, if loan includes working capital, OC must be a co-borrower; (§120.111(a)(5))
✓ Each 20% or more owner of EPC or OC is personal guarantor (trustee executes on behalf of trust); (§120.111(a)(6))
✓ Lease payment is no greater than debt payment plus reasonable property maintenance; (§120.110(c) investment property prohibition)
✓ 100% of space is leased by OC directly from EPC; (§120.110(c) and SOP 50 10 4e, Sub A, Chap 2, Para 9) and
✓ If EPC is a trust, additional conditions have been met. (§120.111(b))
8. Proceeds fund sound business purposes. (13 CFR §120.130) Yes ☐ No ☐
✓ (Proceeds are **not eligible** for payment or distribution to Associates (owner) of the applicant (business) (except for ordinary compensation for services rendered or interim loan financing); to refinance a Small Business Investment Company debt (13 CFR §120.130(a)); for floor plan financing (13 CFR §120.130(c)); to finance investments in real or personal property acquired and held primarily for sale, lease or investment except for EPC or 100% change of ownership stock purchase (13 CFR §120.130(d)); for the benefit of anyone other than the applicant business (this provision restricts proceeds going to the business owner(s) §120.130(e)); or to pay past-due Federal or state payroll taxes held in trust (13 CFR §120.160(d))

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9. All Debt Refinancing conditions have been met. (13 CFR §120.201; SOP 50 10 4e, Sub A, Chap 2, Para 12) Yes ☐ No ☐ N/A ☐
- ✓ Creditor(s) to be paid are not in position to sustain loss. (13 CFR §120.201)
 - ✓ Existing debt to be refinanced is not on reasonable terms. (SOP 50 10 4e, Sub A, Chap 2, Para 12.a.)
 - ✓ Refinancing provides a substantial benefit to the small business: (Para 12.a.)
 - For long-term debt, the business must receive a permanent substantial benefit, which is defined as at least 20% improvement to the company's cash flow & for multiple debts, the change in debt service burden (cash flow requirement) of each debt must be determined & no refinanced debt can have a higher debt service requirement after refinancing; (Para 12.a.(1)) and
 - If short-term debt (including credit card debt), balloon payment notes & interest only debt, substantial benefit is presumptive; (Para 12.a.(2)-(4))
 - ✓ If long-term debt, the need for the business to receive a lower debt service requirement is justified. (Para 12.a.(1))
 - ✓ If short-term debt (including credit card debt), documentation confirms that the debt was used for legitimate business purposes of the applicant. (Para 12.a.(2))
 - ✓ Existing debt is not SBA guaranteed debt. (Para 12.d.)
 - ✓ Existing debt is not SBIC debt. (Para 12.g.(1))
 - ✓ Existing debt is not third-party financing for an existing 504 project. ((Para 12.g.(4))
10. All occupancy percentage and proceed requirements are met when the loan proceeds were used to acquire, build or renovate real property and borrower does not occupy 100%. (13 CFR §120.131) Yes ☐ No ☐ N/A ☐
- ✓ For construction of a new building **with** residential and/or rental space, the borrower/OC: (§120.131(a); Procedural Notice 5000-703):
 - Can occupy at least 60% of the rentable property immediately and must continue to occupy no less than 60% of the rentable property for the term of the loan;
 - Can lease long term, no more than 20% of the rentable property to 1 or more occupants; and
 - Must plan to occupy within 3 years some of the remaining rentable property not immediately occupied or leased long term and occupy within 10 years all of the rentable property not leased long term.
 - ✓ For acquisition, renovation or reconstruction of an existing building **with** residential and/or rental space, conditions: (13 CFR §120.131(b))
 - Allow the borrower/OC(s) to lease out up to 49% of rentable property; and
 - Do not allow proceeds to be used to remodel or convert the space to lease out.
11. All change of ownership eligibility guidelines have been met. (13 CFR §120.202) Yes ☐ No ☐ N/A ☐
- ✓ Justification of change of ownership documented in file (must be reasonable need for change; such as, preservation of business existence or promotion of its sound development. (SOP 50 10 4e, Sub B, Para 3.a.)
 - ✓ Evidence of arms-length transaction through a business valuation. (SOP 510 10 4e, Sub B, Para 3.b.(a))
 - ✓ If buyer and seller are related, valuation is through an independent third party (SOP 50 10 4e, Sub B, Para 3.d.)
 - ✓ Reason for sale is identified (SOP 50 10 4e, Sub B, Para 3.b.(3))

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| 12. Loan is not a piggyback (more than one loan at or about the same time for the same purpose, with the SBA loan in junior lien position). (Policy Notices 5000-931 dated October 1, 2004; 5000-938 dated December 17, 2004) | Yes
<input type="checkbox"/> | No
<input type="checkbox"/> | N/A
<input type="checkbox"/> |
| 13. Franchise is eligible by SBA requirements (13 CFR §120.103(g); and SOP 50-10(4)(e), Sub A, Chap 3, Para 3(e) and Chap 5, Para 6(f)) | Yes
<input type="checkbox"/> | No
<input type="checkbox"/> | N/A
<input type="checkbox"/> |
| 14. Principal(s) are eligible citizens or have eligible non-citizen status, exclusive of 912 issues already cited (13 CFR §120.110(e); SOP 50 10 4e, Sub A, Chap 2, Para 15.h.) | Yes
<input type="checkbox"/> | No
<input type="checkbox"/> | |
| ✓ Status is U.S. citizen, Naturalized Citizen, or one of the following: | | | |
| ✓ Legal Permanent Resident (LPR or immigrant, also known as Permanent Resident Alien) with current/valid INS documents in file for any alien who owns 20% or more of the business (primary document evidencing INS status is INS Form I-551); and evidence that lender has verified INS status of each alien with INS Form 845; (Para 15.h.(3) and (4)) | | | |
| ✓ Non-Immigrant Aliens, (persons admitted to the U.S. for a specific purpose & for temporary period of time) with current/valid INS documents in file permitting them to reside in the U.S. legally; evidence that lender has verified INS status of each alien; evidence that separate continual & consistent management (in addition to the owners) exists & will continue indefinitely (management must be U.S. citizenship or verified LPR status); management must have operated the business for at least one year prior to the application date; and pledge collateral within the jurisdiction of the U.S. sufficient to pay the loan any time during its life; (Para 15.h.(6) and (7)) or | | | |
| ✓ Foreign Nationals (non-citizens who reside outside the U.S.) or Foreign Entities (businesses, organizations, etc. based in another country) (p 70-3 & 70-5) that operates primarily within the U.S.; pays taxes to the U.S.; and uses American products, materials, and labor; evidence that separate continual & consistent management (in addition to the owners) exists & will continue indefinitely (management must be U.S. citizenship or verified LPR status); management must have operated the business for at least 1 year prior to the application date; and pledge collateral within the jurisdiction of the U.S. sufficient to pay the loan any time during its life. Para 15.h.(5) and (7)) | | | |
| 15. No actual or apparent conflicts of borrower and/or lender interest detected (13 CFR §120.140). | Yes
<input type="checkbox"/> | No
<input type="checkbox"/> | |

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|---|--------------------------|--------------------------|--------------------------|
| | Yes | No | N/A |
| 16. Loan meets <i>program-specific</i> eligibility requirements/restrictions for the delivery method under which loan was approved: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
- ☐ **LowDoc** If loan approved as LowDoc delivery method: (SOP 50 10 4e, Appendix 5):
 - No more than 25% of proceeds are repaying same institution debt;
 - ☐ **PLP** If loan approved as Preferred Lender Program (PLP) delivery method: (13 CFR §120.450-455; SOP 50 10 4e; Sub D, Chap 3, Para 7.a.)
 - Applicant is not agricultural, farm, fishing, shore operations, medical facilities including residential care, mines, doing business in foreign countries, or teaching, instructing, counseling or indoctrinating religion or religious beliefs (SOP 50-10(4)(E), Subpart D, Chap 3, Para 7.a.(3));
 - Applicant does not have any other outstanding SBA loans which are not current (SOP 50-10(4)(E), Subpart D, Chap 3, Para 7.a.(4)); and
 - Proceeds do not finance more than 90% of the actual cost of real estate acquired or new business capital needs (SOP 50-10(4)(E), Subpart D, Chap 3, Para 7.a.(4)).
 - ☐ **SBAExpress** If loan approved as SBAExpress (SX) delivery method: (SX Program Guide, Para 5.)
 - Applicant is not agricultural, farm, fishing, shore operations, medical facilities including residential care, mines, doing business in foreign countries, teaching, instructing, counseling or indoctrinating religion or religious beliefs (Para 5.A.(2));
 - Any other outstanding SBA loans of applicant are current (Para 5.A.(5)(a));
 - Any same institution debt being refinanced has been current for at least the last 36 months (Para 5.A.(3));
 - Proceeds do not finance more than 90% of the actual cost of real estate acquired or new business capital needs; (Para 5.A.(5)) and
 - Proceeds do not guarantee or fund a letter of credit (Para 5.A.(5)(j)) (except under Export Express).
 - ☐ **CommunityExpress** If loan approved as CommunityExpress (CX) delivery method (CX Program Guide, Para 7 and 9):
 - Applicant is located in lender-designated geographic area, or otherwise meets eligibility demographic (woman, veteran, minority); (Para 6)
 - Borrower **has received** pre- and post-closing technical and management assistance facilitated by lender; (Para 7)
 - Applicant is not agricultural, farm, fishing, shore operations, medical facilities including residential care, mines, doing business in foreign countries, teaching, instructing, counseling or indoctrinating religion or religious beliefs; (Para 9.A.(3))
 - Any other outstanding SBA loans of applicant are current; (Para 9.A.(6)(a))
 - Any same institution debt being refinanced has been current for at least the last 36 months; (Para 9.A.(4))
 - Proceeds do not finance more than 90% of the actual cost of real estate acquired or new business capital needs, (Para 9.A.(6)(c)) and
 - Proceeds do not guarantee or fund a letter of credit (Para 9.A.(6)(j)).

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17. Collateral Value has been **adequately analyzed**. (13 CFR §120.150(h)) Yes ☐ No ☐ N/A ☐
 Collateral issues to consider include such items as
 ✓ identification of all available collateral,
 ✓ determination of liquidation value,
 ✓ whether method of determining collateral value is acceptable, or
 ✓ determination of overall adequacy of collateral.

List below all collateral that was taken to secure the loan:

Item	Market Value		Percentages		Prior Liens		Liquidation Value	
	Per CM	Adj Val	Per CM	Adj Val	Per CM	Adj Val	Per CM	Adj Val
Commercial Real Estate								
Machinery & Equipment								
Furniture & Fixtures								
Accounts Receivable								
Inventory								
Vehicles								
Investment Real Estate								
Personal Residence								
Other								
TOTAL								
ADJUSTED TOTAL								
Loan Amount								
Fully Secured (Shortfall)								
Per CM								
Fully Secured (Shortfall)								
Adjusted								

18. If loan was not fully secured, was SBA policy followed for obtaining additional collateral? (13 CFR §120.150(h)) Yes ☐ No ☐ N/A ☐

List below all available collateral that was not taken to secure the loan:

Item	Value	Prior Lien	Equity

19. As applicable, personal or corporate guaranties have been obtained in accordance with SBA policy. (13 CFR §120.160(a); SOP 50 10 4e, Sub A, Chap 5, Para 2) Yes ☐ No ☐ N/A ☐

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|-----|---|---------------------------------|--------------------------------|---------------------------------|
| 20. | <p>Lender has verified the borrower injection prior to disbursement. (13 CFR §120.410(a))</p> <p>Normal documentation might include evidence that outside cash has been moved into the business after the loan acceptance, by examples such as</p> <ul style="list-style-type: none"> ✓ cleared checks & bank statements prior to disbursement, ✓ evidence of business account deposit, ✓ HUD-1, ✓ attorney certification, ✓ paid invoices, or ✓ other evidence. <p>Borrower promissory notes, gift letters or financial statements are not sufficient.</p> | Yes
<input type="checkbox"/> | No
<input type="checkbox"/> | N/A
<input type="checkbox"/> |
| 21. | <p>Any required appraisals and environmental assessments on primary collateral have been obtained and meet conditions outlined in authorization and/or credit memo (13 CFR §120.160(b); SOP 50-10 4e, Sub A, Chap 5, Para 3, 7)</p> | Yes
<input type="checkbox"/> | No
<input type="checkbox"/> | N/A
<input type="checkbox"/> |
| 22. | <p>Flood insurance determination has been made via FEMA Form 81-93, and flood insurance obtained when necessary. (13 CFR §120.170; (SOP 50-10 4e, Sub A, Chap 5, Para 6(b))</p> | Yes
<input type="checkbox"/> | No
<input type="checkbox"/> | N/A
<input type="checkbox"/> |
| 23. | <p>All other required insurance has been obtained. (13 CFR §120.160(c); (SOP 50-10 4e, Sub A, Chap 5, Para 4)</p> | Yes
<input type="checkbox"/> | No
<input type="checkbox"/> | N/A
<input type="checkbox"/> |
| 24. | <p>Evidence that all required IRS tax transcript(s) have been obtained and reviewed (13 CFR §120.410(a); SOP 50-10 4e, Sub A, Chap 6, Para 4.f.)</p> <p>Lender has followed SBA policy to obtain IRS tax transcript(s) when applicable, and IRS tax transcript(s) and borrower's or seller's tax return or financial statements have been compared to verify that no substantial discrepancies exist</p> | Yes
<input type="checkbox"/> | No
<input type="checkbox"/> | N/A
<input type="checkbox"/> |
| 25. | <p>Evidence that the loan proceeds were used for purposes defined in the loan authorization. (13 CFR §120.410(a))</p> <p>Lender's SBA Form 1050 disbursements are supported by proof of asset acquisition including closing statements, paid invoices when reimbursing the borrower, or other verifiable proof of purchase, or deposit of working capital funds into the borrower's operating account.</p> | Yes
<input type="checkbox"/> | No
<input type="checkbox"/> | |
| 26. | <p>Stand-by agreements have been obtained and properly executed, when applicable. (13 CFR §120.410(a))</p> | Yes
<input type="checkbox"/> | No
<input type="checkbox"/> | N/A
<input type="checkbox"/> |
| 27. | <p>Evidence that lender performed a site visit or engaged in other intensive servicing activities when loan became 60 days past due or otherwise indicated reasons for elevated concern. (13 CFR §120.410(a))</p> | Yes
<input type="checkbox"/> | No
<input type="checkbox"/> | N/A
<input type="checkbox"/> |

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|-----|---|---------------------------------|--------------------------------|---------------------------------|
| 28. | <p>Lender had prior written SBA approval for the following servicing & liquidation actions: (13 CFR §§120.513, 540)</p> <ul style="list-style-type: none"> ✓ Any action that would create a conflict of interest or confer any preference on the lender in collection or lien position with respect to SBA's position or the shared SBA/lender position on the guaranteed loan; (13 CFR §§120.453, 513(a); SOP 50 10 4e, Sub D, Chap 3, Para 9; SOP 50 51 2a, Chap 10, Para 5.b.(1)) ✓ Accept a compromise settlement for less than the full amount due of the principal loan balance; (13 CFR §120.513(e); SOP 50 10 4e, Sub D, Chap 3, Para 9; SOP 50 51 2a, Chap 10, Para 5.b.(2)) ✓ Acceleration of the maturity of Note; (13 CFR §120.513(c)) ✓ Acquire environmentally impaired property; (13 CFR §120.453; SOP 50 10 4e, Sub D, Chap 3, Para 9, SOP 50-50 4, Chap 6, Para 5(4)(c); SOP 50-51 2, Chap 10, Para 5) ✓ Transfer of the loan to another lender; (SOP 50-50 (4) Chap 6, Para 5(4)(d); SOP 50-51(2) 10-11) ✓ Title property in the name of the Agency; (13 CFR §120.453; SOP 50-51 2 Chap 10, Para 5) or. ✓ Incurring litigation legal fees exceeding \$5,000; (SOP 50-50 4, Chap 4, Para 11.b., SOP 50-51 2, Chap 10, Para 5.f.; Litigation SOP for \$5,000, Chap 4, Sec 11b, Chap 10, Sec 5f, and Chap 8 Sec 22b). | Yes
<input type="checkbox"/> | No
<input type="checkbox"/> | N/A
<input type="checkbox"/> |
| 29. | <p>Lender has provided notice to SBA upon classification of the loan into "liquidation." (SOP 50 51 2A, Chap 8, Para 5; For PLP lenders, Chap 10, Para 5c(1))</p> | Yes
<input type="checkbox"/> | No
<input type="checkbox"/> | N/A
<input type="checkbox"/> |
| 30. | <p>Lender has a written liquidation plan. (SOP 50 51 2A, Chap 10, Para 5f(1))</p> | Yes
<input type="checkbox"/> | No
<input type="checkbox"/> | N/A
<input type="checkbox"/> |
| 31. | <p>Evidence that, upon placing the loan in liquidation, lender performed timely site visits and took reasonable steps to secure the collateral. (SOP 50 51 2A, Chap 8, Para 8; For PLP Lenders Chap 10, Para 5d(2) - PLP)</p> | Yes
<input type="checkbox"/> | No
<input type="checkbox"/> | N/A
<input type="checkbox"/> |
| 32. | <p>Current appraisals were used by the lender to evaluate liquidation collateral. (SOP 50 51 2A, Chap 16, Para 3b)</p> | Yes
<input type="checkbox"/> | No
<input type="checkbox"/> | N/A
<input type="checkbox"/> |
| 33. | <p>If a liquidation case where title of property was taken, was an environmental review done prior to the acquisition of title? (SOP 50 51 2A, Chap 6, Para 2h, 15, 16)</p> | Yes
<input type="checkbox"/> | No
<input type="checkbox"/> | N/A
<input type="checkbox"/> |
| 34. | <p>Lender has forwarded all recoveries on repurchased loans within 15 days of receipt. (SOP 50 51 2A, Chap 8, Para 24b, 25; Chap 10, Para 5j(3)(a))</p> | Yes
<input type="checkbox"/> | No
<input type="checkbox"/> | N/A
<input type="checkbox"/> |
| 35. | <p>The Wrap-Up Report has been completed and submitted to SBA when lender has determined the loan will not be fully repaid after all worthwhile collateral has been liquidated and no further recoveries are anticipated within a reasonable time. (For PLP Lenders SOP 50 51 2A, Chap 10, Para 5 n(1); For LowDoc Lenders Chap 10, Para 1.p.)</p> | Yes
<input type="checkbox"/> | No
<input type="checkbox"/> | N/A
<input type="checkbox"/> |

DESCRIBE/EXPLAIN ANY "NO" COMPLIANCE ANSWERS.

ATTACH ADDITIONAL PAGES AS NECESSARY.

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36. **Repayment assessment.** (13 CFR §120.150(a), (c)-(e), (i))

DSC Ratio _____ Credit Score(s) _____

Describe and assess lender's approach to evaluation of repayment ability.

Was lender's repayment decision reasonably sufficient?

Fully explain any "No" answer. (13 CFR §120.410(a))

Yes No

☐ ☐

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37. **Capitalization assessment.** (13 CFR §120.150(f))

Debt/Net Worth Ratio _____

Describe and assess lender's approach to evaluation of business capitalization.

Was lender's capitalization decision reasonably sufficient?
Fully explain any "No" answer. (13 CFR §120.410(a))

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>

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38. **Management assessment.** (13 CFR §120.150(b))

Describe and assess lender's approach to evaluation of management ability.

Was lender's management ability decision reasonably sufficient?
Fully explain any "No" answer. (13 CFR §120.410(a))

Yes No
☐ ☐

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39. **Collateral perfection/closing requirements.** (13 CFR §120.150(h))

Describe and assess lender's closing and collateral perfection activities.

Were lender's closing activities reasonably sufficient?
Fully explain any "No" answer. (13 CFR §120.410(a))

Yes No
☐ ☐

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40. **Monitoring current creditworthiness** (within the last 12 months). (13 CFR §120.150(g))

Describe and assess lender's approach to monitoring borrower's current creditworthiness.

Was lender's monitoring of continued creditworthiness reasonably sufficient? Fully explain any "No" answer. (13 CFR §120.410(a))

Yes No
☐ ☐

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41. **Intensive servicing/liquidation activities.** (as applicable) (13 CFR §120.410(a))

Describe and assess lender's approach to intensive servicing or liquidation.

Were lender's intensive servicing/liquidation activities reasonably sufficient? Fully explain any "No" answer. (13 CFR §120.410(a))

Yes No
☐ ☐